

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re: FIELDWOOD ENERGY LLC, <i>et al.</i>, Debtors.¹	§ Chapter 11 § § Case No. 20-33948 (MI) § § (Jointly Administered)
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BP EXPLORATION & PRODUCTION INC.’S WITNESS AND EXHIBIT LIST

BP Exploration & Production Inc. (“BP”) files this Witness and Exhibit List identifying those individuals that may be called as witnesses and exhibits that may be introduced at the hearing on (i) *Motion of BP Exploration & Production Inc. for Entry of An Order Pursuant to 11 U.S.C. Section 362(d) Authorizing Relief From the Automatic Stay to Effectuate Setoff of Mutual Obligations* (the “Stay Motion”), [Docket No. 1666], scheduled for **July 15, 2021, at 9:00 a.m.** (prevailing Central Time) (the “Hearing”).

A. WITNESSES

In connection with the Hearing, BP may call any one or more of the following individuals to provide testimony:

1. Adriana Bonjour Salinas, Controller, BP Exploration & Production Inc.;
2. Any witness necessary to authenticate a document;
3. Any witness designated or called by any other party; and
4. Any impeachment or rebuttal witness.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, as applicable, are: Fieldwood Energy LLC (6778), Fieldwood Energy Inc. (4991), Fieldwood Onshore LLC (3489), Fieldwood SD Offshore LLC (8786), Fieldwood Energy Offshore LLC (4494), Fieldwood Offshore LLC (2930), GOM Shelf LLC (8107), FW GOM Pipeline, Inc. (8440), Galveston Bay Procession LLC (5703), Galveston Bay Procession LLC (0422), Fieldwood Energy SP LLC (1971), Dynamic Offshore Resources NS, LLC (0158), Bandon Oil and Gas, LP (9266), and Bandon Oil and Gas GP, LLC (9172). The Debtors’ primary mailing address is 2000 W. Sam Houston Parkway S., Suite 1200, Houston, TX 77042.

B. EXHIBITS

In connection with the Hearing, BP may seek to introduce into evidence any one or more of the following documents:

Ex. #	Description	Offered	Obj.	Admitted	Disposition
1.	Purchase and Sale Agreement by and between Fieldwood Energy LLC and BP Exploration and Production Inc. for Mississippi Canyon Block 519 (dated May 17, 2019; eff. May 1, 2019) [filed under seal]				
2.	Cash Consideration Exchange Agreement by and between Fieldwood Energy LLC and BP Exploration and Production Inc. for Mississippi Canyon 562 (dated and eff. October 15, 2018) [filed under seal]				
3.	Excerpt of the Transcript from the Court's June 21, 2021 Hearing				
4.	Excerpt of the Transcript from the Court's June 22, 2021 Hearing				
5.	Excerpt of the Transcript from the Court's February 2, 20221 Hearing				
6.	Any exhibit designated by any other party				
7.	Any pleadings, reports, or other documents filed in the Debtors' bankruptcy case				
8.	Any impeachment or rebuttal exhibits				

BP reserves the right to supplement or amend this Witness and Exhibit List at any time prior to the Hearing. BP also reserves the right to rely upon and use as evidence additional documents produced by the Debtors or any other party in interest.

Dated: July 13, 2021

Respectfully submitted,

GREENBERG TRAURIG, LLP

By: /s/ Shari L. Heyen

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Counsel for BP Exploration & Production Inc.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on July 13, 2021, a true and correct copy of the foregoing Witness and Exhibit List was served by electronic mail via the Court's ECF system to all parties authorized to receive notice in this case.

By: /s/ Shari L. Heyen

Shari L. Heyen